

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

EPIC COMPANIES, LLC,

Debtors.¹

**JEFFREY T. VARSALONE,
LIQUIDATING TRUSTEE,
Plaintiff.**

VS.

CENTRAL BOAT RENTALS, INC.
Defendant.

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Chapter 11

Case No. 19-34752 (DRJ)

(Jointly Administered)

Adv. No. 21-03893

**STIPULATION OF CENTRAL BOAT RENTALS, INC. AND THE LIQUIDATING
TRUSTEE EXTENDING DEADLINE TO RESPOND TO LIQUIDATING
TRUSTEE’S COMPLAINT TO AVOID AND RECOVER TRANSFERS
PURSUANT TO 11 U.S.C. §§ 547 AND 550 AND TO DISALLOW
CLAIMS PURSUANT TO 11 U.S.C. § 502
[Relates to Docket No. 1]**

Jeffrey T. Varsalone, as the Liquidating Trustee for Epic Companies, LLC Trust (the “Liquidating Trustee” or the “Plaintiff”), and Central Boat Rentals, Inc. (the “Defendant”, and collectively with the Liquidating Trustee, the “Parties”) hereby stipulate and agree as follows:

WHEREAS, on August 25, 2021, the Liquidating Trustee filed his *Complaint to Avoid and Recover Transfers Pursuant to 11 U.S.C. §§ 547 and 550 and to Disallow Claims Pursuant to 11 U.S.C. § 502* [Adv. Proc. 21-03893, Docket No. 1] (the “Complaint”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Epic Companies, LLC (1473), Epic Diving & Marine Services, LLC (2501), Epic Applied Technologies, LLC (5844), Epic Specialty Services, LLC (8547), Epic Alabama Steel, LLC (6835), Epic San Francisco Shipyard, LLC (5763) and Zuma Rock Energy Services, LLC (1022). The mailing address for the Debtors is: P.O. Box 79625, Houston, Texas 77279-9625.

WHEREAS, on August 26, 2021, former bankruptcy counsel, J. Stephen Simms, accepted service on behalf of the Defendant.

WHEREAS, on August 27, 2021, service of summons and a copy of the Complaint was made on the Defendant [Adv. Proc. 21-03893, Docket No. 6].

WHEREAS, the Defendant's deadline to respond to the Complaint is through and including September 27, 2021 (the "Response Deadline").

WHEREAS, on September 24, 2021, the Parties agreed to extend the Response Deadline through and including October 18, 2021.

Accordingly, it is hereby STIPULATED and AGREED that:

1. The Defendant's deadline to respond to the Complaint is extended through and including October 18, 2021.
2. The undersigned represent that they are authorized to execute this Stipulation on behalf of the representative party for whom they have signed.

STIPULATED AND AGREED TO BY:

PORTER HEDGES LLP By: <u>/s/ M. Shane Johnson</u> John F. Higgins (TX 09597500) Eric M. English (TX 24062714) M. Shane Johnson (TX 24083263) 1000 Main Street, 36th Floor Houston, Texas 77002 Telephone: (713) 226-6000 Fax: (713) 226-6248 COUNSEL FOR LIQUIDATING TRUSTEE	LUGENBUHL, WHEATON, PECK, RANKIN & HUBBARD By: <u>/s/ Joseph P. Briggett</u> Joseph P. Briggett 601 Poydras St., Suite 2775 New Orleans, Louisiana 70130 Telephone: (504) 568-1990 Fax: (504) 310-9195 COUNSEL FOR CENTRAL BOAT RENTALS, INC.
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